INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

February 9, 2004

TO: Interested Parties / Applicant

RE: Elite Enterprises, Inc. / SPM 003-17491-00205

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNTV-PMOD.doc 9/16/03

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February 9, 2004

Michael Kreps
Elite Enterprises, Inc.
2701 S. Coliseum Blvd., Suite 1158
Fort Wayne, IN 46803

Re: 003-17491-00205
First Significant Permit Modification to:
Part 70 Permit No.: T003-7588-00205

Dear Mr. Kreps:

Elite Enterprises, Inc. was issued Part 70 operating permit T003-7588-00205 on September 3, 1999 for the operation of a metal and plastic surface coating operation for transportation (automotive and trucking), medical, consumer, and building industries. A letter requesting changes to this permit was received on December 5, 2002. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

All other conditions of the permit shall remain unchanged and in effect.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter please contact Alic Bent, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (973) 575-2555, ext. 3206 or dial (800) 451-6027, press 0 and ask for extension 3-6878.

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
AB/EVP
cc: File - Allen County
Air Compliance Section Inspector - Jennifer Dorn
Compliance Data Section - Karen Nowak
Technical Support and Modeling - Michele Boner
Administrative and Development

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PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Elite Enterprises, Inc.
2701 South Coliseum Boulevard
Suite 1158
Fort Wayne, Indiana 46803

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T003-7588-00205	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: September 3, 1999 Expiration Date: September 3, 2004

First Significant Permit Modification 003-17491-00205	Pages Revised: 1, 4, 22,23, 26 - 30, 30a - 30c and 34
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: February 9, 2004

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary metal and plastic surface coating operation for transportation (automotive and trucking), medical, consumer, and building industries.

Responsible Official:	Michael R. Kreps
Source Address:	2701 South Coliseum Boulevard, Suite 1158. Fort Wayne, IN 46803
Mailing Address:	2701 South Coliseum Boulevard, Suite 1158. Fort Wayne, IN 46803
Phone Number:	(219) 420-1605
SIC Code:	3479, 3089
County Location:	Allen
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) Four (4) paint booths, identified as PB1, PB2, PB3, PB4, each equipped with two (2) 8,200 acfm exhaust fan, with a maximum capacity of one of the following:
  (1) 280 plastic large end caps per hour;
  (2) 280 plastic air deflectors per hour;
  (3) 140 plastic door trim parts per hour;
  (4) 420 miscellaneous metal parts per hour

all paint booths listed are each equipped with either a high volume low pressure (HVLP) spray gun applications or an electrostatic spray equipment and water wash filtration for particulate matter control and each exhausting through one (1) stack, ID #'s PB-1 through PB-4, respectively.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

SECTION C SOURCE OPERATION CONDITIONS

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within “normal” parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

Part 2 MACT Application Submittal Requirement

C.22 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]

(a) The Permittee shall submit a Part 2 MACT Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).

(b) Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:

(1) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;

(2) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or

(3) The MACT standard or standards for the affected source categories included at the source are promulgated.

(c) Notwithstanding paragraph (a), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The initial notification shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(a) Four (4) paint booths, identified as PB1, PB2, PB3, PB4, each equipped with two (2) 8,200 acfm exhaust fan, with a maximum capacity of one of the following:
  (1) 280 plastic large end caps per hour;
  (2) 280 plastic air deflectors per hour;
  (3) 140 plastic door trim parts per hour;
  (4) 420 miscellaneous metal parts per hour

all paint booths listed are each equipped with either a high volume low pressure (HVLP) spray gun applications or an electrostatic spray equipment and water wash filtration for particulate matter control and each exhausting through one (1) stack, ID #'s PB-1 through PB-4, respectively.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart MMMM] [40 CFR 63.3901]

(a) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart MMMM. The Permittee must comply with these requirements on and after August 18, 2006.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.1.2 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart PPPP] [40 CFR 63.2398]

(a) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.1.3 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart MMMM] [40 CFR 63.3882] [40 CFR 63.3883]

[40 CFR 63.3980]

(a) The provisions of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at http://www.epa.gov/ttn/atw/misc/miscpg.html. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart MMMM.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

(c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).

(1) All coating operations as defined in 40 CFR 63.3981;

(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, which are incorporated by reference.

D.1.4 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]

(a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at http://www.epa.gov/ttn/atw/plastic/plasticpg.html. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after August 22, 2006.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

(c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:

(1) All coating operations as defined in 40 CFR 63.4581;

(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, and are applicable to the affected source.

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to CP 003-8519-00205, issued on October 22, 1997, BACT for the four (4) paint booths (PB1 - PB4) for the coating of plastic parts shall be as follows:

(a) high volume low pressure (HVLP) spray equipment shall be used for all first coat applications,

(b) either HVLP or electrostatic equipment shall be used for second coat applications,

(c) application of coating to a substrate by means of HVLP spray equipment shall operate between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system, and

(d) a test gauge air cap and air cap assembly shall be utilized on the HVLP spray equipment and recorded weekly.

(e) the VOC content of the coatings as applied to the plastic parts shall not exceed the following limits:

(1) 5.8 lb VOC per gallon of coating, minus water for topcoats, and

(2) 3.7 lb VOC per gallon of coating, minus water for prime coats.

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the paint booths which coats metal parts shall be limited to:

Coatings	Limit (pounds of VOC/gallon of coating less water delivered to the applicator)
Air Dried Coat	3.5
Extreme Performance Coat	3.5
All Other Coat	3.0

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.7 PSD Minor Limit [326 IAC 2-2]

Pursuant to the requirement from CP-003-8519-00205, issued on October 22, 1997 and modified in Significant Source Modification 003-16500-00205, the VOC usage including coatings, dilution solvents, and cleaning solvents at the four (4) paint booths shall be limited to less than 250 tons of VOC per 12 consecutive month period, with compliance demonstrated at the end of each month. This usage limit is required to limit the source wide potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.8 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to CP-003-8519-00205, issued on October 22, 1997 and 40 CFR 52 Subpart P, the PM from the four (4) paint booths (PB1 - PB4)shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.9 Particulate [326 IAC 6-3-2(d)]

Pursuant to CP-003-8519-00205, issued on October 22, 1997 and 326 IAC 6-3-2(d), particulate from the four (4) paint booths (PB1 - PB4) shall each be controlled by a waterwash, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.10 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.11 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limits specified in Conditions D.1.1, D.1.2, and D.1.3 and the PM limit specified in Condition D.1.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.12 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

(a) Compliance with the VOC content limit in conditions D.1.1(b) and D.1.2 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

A = [? © x U) / ? U]

Where: A is the volume weighted average in pounds VOC per gallon less water as

applied;
C is the VOC content of the coating in pounds VOC per gallon less water as applied;
and U is the usage rate of the coating in gallons per day.

(b) Compliance with the VOC content and usage limitations contained in Condition D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.13 Monitoring

(a) Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks (PB-1 through PB-4) while the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.14 Record Keeping Requirements

(a) To document compliance with conditions D.1.5 and D.1.6, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in conditions D.1.5 and D.1.6.

(1) The VOC content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used on daily basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.

(3) The volume weighted average VOC content of the coatings used for each day;

(4) The daily cleanup solvent usage; and

(5) The total VOC usage for each day.

(6) A record of the test gauge air pressure utilized on the HVLP spray equipment for each week.

(b) To document compliance with Condition D.1.7, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.1.7.

(1) The amount of coating material and solvent used on monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.

(2) The cleanup solvent usage for each month;

(3) The total VOC usage for each month; and

(4) The weight of VOCs emitted for each compliance period.

(c) To document compliance with Condition D.1.13, the Permittee shall maintain a log of weekly overspray observations, weekly observations of the water level in the pans, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.15 Notification Requirements [40 CFR 63.3910]

(a) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).

(b) Initial notification. The Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart MMMM.

(c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

D.1.16 Notification Requirements [40 CFR 63.4510]

(a) General. The Permittee must submit the notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the source by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.

(b) Initial notification. The Permittee must submit the initial notification required by 40 CFR 63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after the effective date of 40 CFR Part 63, Subpart PPPP, whichever is later. (For an existing affected source) the Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart PPPP. If the Permittee is using compliance with the Automobiles and Light-Duty Trucks NESHAP (subpart IIII of this part) under 40 CFR 63.4881(d) to constitute compliance with this subpart for the plastic part coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart. If the Permittee is complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.

(c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510, paragraphs (c)(1) through (11) and in 40 CFR 63.9(h).

D.1.17 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart MMMM and Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

(b) The significant permit modification application shall be submitted no later than twenty-seven months after the effective date of 40 CFR 63, Subpart MMMM and Subpart PPPP.

(c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

D.1.18 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.7 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Elite Enterprises, Inc.
Source Address: 2701 South Coliseum Boulevard, Suite 1158, Fort Wayne, IN 46803
Mailing Address: 2701 South Coliseum Boulevard, Suite 1158, Fort Wayne, IN 46803
Part 70 Permit No.: T003-7588-00205
Facility: Four (4) paint booths
Parameter: Volatile Organic Compounds (VOC)
Limit: The four (4) paint booths shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period, with compliance demonstrated at the end of each month.

Month	VOC Usage This Month	VOC Usage Previous 11 Months	VOC Usage 12 Month Total
Month 1			
Month 2			
Month 3			

? No deviation occurred in this month.

? Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document (TSD) for a Significant Permit Modification to a Part 70 Permit

Source Name:	Elite Enterprises, Inc.
Source Location:	2701 South Coliseum Blvd., Fort Wayne, Indiana 46803
SIC Code:	3479, 3089
County:	Allen
Operation Permit No.:	SPM003-17491-00205
Permit Reviewer:	Alic Bent /EVP

On August 23, the Office of Air Quality (OAQ) had a notice published in the Fort Wayne Journal Gazette, Indiana, stating that Elite Enterprises, Inc. had applied for replacement of nine (9) existing paint booths, with four (4) larger, more efficient booths to their metal and plastic surface coating operation for transportation (automotive and trucking), medical, consumer, and building industries. The notice also stated that OAQ proposed to issue a Significant Permit Modification for this operation and provided information on how the public could review the proposed Significant Permit Modification and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Significant Permit Modification should be issued as proposed.

On August 7, 2003, Anthony C. Sullivan, a representative of Elite Enterprises, Inc. submitted a comment on the proposed Significant Permit Modification. The summary of the comment and corresponding response is as follows (bolded language has been added and the language with a line through it has been deleted):

Comment 1

On behalf of Elite Enterprises, Inc., this letter is to provide notice that it will utilize four stacks for each of its four paint booths, rather than two. The booths are equipped with four stacks, but only two has been previously utilized. This change is necessary to obtain proper balance. No emission change will result, therefore no permit modification is required.

Response 1

The permit currently list four (4) stacks ID #'s PB-1 through PB-4. Therefore, there are no changes to the permit as a result of this comment.

Upon further review, the OAQ has decided to make the following changes to the Significant Permit Modification. Bolded language has been added and the language with a line through it has been deleted.

1. The following revisions have been made to the Technical Support Document (**bolded** language has been added, the language with a ~~line~~ through it has been deleted). The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. The Technical Support Document has been revised to clarify that the modification to this source is not new construction.

   The spray application equipment in the proposed paint booths is the same equipment that was in the paint booths permitted in the existing Title V permit. No new application equipment was purchased only robots for the spray guns**.**

History

On December 5, 2002 Elite Enterprises, Inc. submitted an application to the OAQ requesting permission to upgrade the coating operation of the source. The changes requested by the source are as follows:

The replacement of the nine (9) existing paint booths (PB1 - PB~~11~~**9**), with four (4) larger, more efficient booths (PB1 - PB4). ~~The nine (9) existing paint booths to be replaced utilize manual applicators and the four (4) proposed booths will use robotic applicators.~~ **The guns to be used in the four (4) booths are the same automatic electrostatic guns that are currently used on the reciprocators of the nine (9) existing paint booths. No new application equipment was purchased. However, the guns will be operated robotically instead of manually as in the nine (9) existing paint booths.** In addition, the source is requesting the addition of a new conveyor system for the booths. The proposed replacement of the paint booths will cause an increase in the potential to emit VOC, PM and PM-10 and will trigger additional compliance requirements. The source will continue to limit source wide VOC emissions to less than 250 tons per year, therefore this modification is not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration). Since the fixed capital cost of the replacement does not exceed 50% of the fixed capital cost of a comparable new facility, there is no reconstruction or new construction to the source or to the Title V permit as a result of this replacement.

2. There is no reconstruction or new construction to the source or to the Title V permit as a result of the replacement of the nine (9) paint booths with the four (4) paint booths and the coating methods for the proposed four (4) paint booths will be the same as the old booths. Therefore, IDEM determined that the BACT approved in 1997 for the previous nine (9) paint booths is still valid for the four (4) proposed booths. Condition D.1.1 (re-numbered D.1.5) in T003-7588-00205 have been revised to reflect that BACT for the previous nine (9) paint booths is still valid for the four (4) proposed booths.

D.1.~~1~~**5** Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

~~(a)~~ Pursuant to CP 003-8519-00205, issued on October 22, 1997, ~~a BACT analysis was performed for the coating of plastic parts. BACT shall be considered satisfied by OAM~~ **OAQ** ~~provided that the following requirements are met:~~ **BACT for the four (4) paint booths (PB1 - PB4) for the coating of plastic parts shall be as follows:**

(~~1~~**a**) high volume low pressure (HVLP) spray equipment shall be used for all first coat applications,

(~~2~~**b**) either HVLP or electrostatic equipment shall be used for second coat applications,

(~~3~~**c**) application of coating to a substrate by means of HVLP spray equipment shall operate between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system, and

(~~4~~**d**) a test gauge air cap and air cap assembly shall be utilized on the HVLP spray equipment and recorded weekly.

(~~b~~**e**) ~~Pursuant to CP-003-8519-00205, issued on October 22, 1997, t~~he VOC content of the coatings as applied to the plastic parts shall not exceed the following limits:

(1) 5.8 lb VOC per gallon of coating, minus water for topcoats, and

(2) 3.7 lb VOC per gallon of coating, minus water for prime coats.

3. The four (4) paint booths, identified as PB1, PB2, PB3, PB4 at this source is subject to 40 CFR Part 63, Subpart MMMM (Miscellaneous Metal Parts and Products) and Subpart PPPP (Surface Coating of Plastic Parts and Products) because they coat both metal and plastic parts, respectively, and the source is a major source of HAPs.

D.1.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart MMMM] [40 CFR 63.3901]

(a) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart MMMM. The Permittee must comply with these requirements on and after August 18, 2006.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.1.2 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart PPPP] [40 CFR 63.2398]

(a) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.1.3 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart MMMM] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

(a) The provisions of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at http://www.epa.gov/ttn/atw/misc/miscpg.html. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart MMMM.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

(c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).

(1) All coating operations as defined in 40 CFR 63.3981;

(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, which are incorporated by reference.

D.1.4 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]

(a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at http://www.epa.gov/ttn/atw/plastic/plasticpg.html. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after August 22, 2006.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

(c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:

(1) All coating operations as defined in 40 CFR 63.4581;

(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, and are applicable to the affected source.

RECORD KEEPING AND REPORTING REQUIREMENTS

D.1.15 Notification Requirements [40 CFR 63.3910]

(a) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).

(b) Initial notification. The Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart MMMM.

(c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

D.1.16 Notification Requirements [40 CFR 63.4510]

(a) General. The Permittee must submit the notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the source by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.

(b) Initial notification. The Permittee must submit the initial notification required by 40 CFR 63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after the effective date of 40 CFR Part 63, Subpart PPPP, whichever is later. (For an existing affected source) the Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart PPPP. If the Permittee is using compliance with the Automobiles and Light-Duty Trucks NESHAP (subpart IIII of this part) under 40 CFR 63.4881(d) to constitute compliance with this subpart for the plastic part coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart. If the Permittee is complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.

(c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510, paragraphs (c)(1) through (11) and in 40 CFR 63.9(h).

D.1.17 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart MMMM and Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

(b) The significant permit modification application shall be submitted no later than twenty-seven months after the effective date of 40 CFR 63, Subpart MMMM and Subpart PPPP.

(c) The significant permit modification application shall be submitted to:

**Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Significant Source Modification and Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	Elite Enterprises, Inc.
Source Location:	2701 South Coliseum Blvd., Fort Wayne, Indiana 46803
County:	Allen
SIC Code:	3479, 3089
Operation Permit No.:	T003-7588-00205
Operation Permit Issuance Date:	September 3, 1999
Source Modification No.:	SSM003-16500-00205
Permit Modification No.:	SPM003-17491-00205
Permit Reviewer:	Alic Bent/EVP

The Office of Air Quality (OAQ) has reviewed a modification application from Elite Enterprises, Inc. relating to the operation of a metal and plastic surface coating operation for transportation (automotive and trucking), medical, consumer, and building industries.

History

On December 5, 2002 Elite Enterprises, Inc. submitted an application to the OAQ requesting permission to upgrade the coating operation of the source. The changes requested by the source are as follows:

The replacement of the nine (9) existing paint booths (PB1 - PB11), with four (4) larger, more efficient booths (PB1 - PB4). The nine (9) existing paint booths to be replaced utilize manual applicators and the four (4) proposed booths will use robotic applicators. In addition, the source is requesting the addition of a new conveyor system for the booths. The proposed replacement of the paint booths will cause an increase in the potential to emit VOC, PM and PM-10 and will trigger additional compliance requirements. The source will continue to limit VOC emissions to less than 250 tons per year, therefore this modification is not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration). Since the fixed capital cost of the replacement does not exceed 50% of the fixed capital cost of a comparable new facility, there is no reconstruction or new construction to the source or to the Title V permit as a result of this replacement.

Emission Units and Pollution Control Equipment

The modification to the source involves the following facilities/units which are replacing the existing permitted units and should have received a Significant Source Modification pursuant to 326 IAC 2-7-10.5(f)(4)(D) prior to modification:

(a) Four (4) paint booths, identified as PB1, PB2, PB3, PB4, each equipped with two (2) 8,200 acfm exhaust fan, with a maximum capacity of one of the following:
  (1) 280 plastic large end caps per hour;
  (2) 280 plastic air deflectors per hour;
  (3) 140 plastic door trim parts per hour;

(4) 420 miscellaneous metal parts per hour

All paint booths listed are each equipped with either a high volume low pressure (HVLP) spray gun applications or an electrostatic spray equipment and water wash filtration for particulate matter control and each exhausting through one (1) stack, ID #'s PB-1 through PB-4, respectively.

Existing Approvals

The source was issued a Part 70 Operating Permit T003-7588-00205 on September 3, 1999.

Enforcement Issue

(a) IDEM is aware that equipment has been modified prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Emission Units and Pollution Control Equipment.*

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
PB1	Paint Booth	87	36	16,400	Ambient
PB2	Paint Booth	87	36	16,400	Ambient
PB3	Paint Booth	87	36	16,400	Ambient
PB4	Paint Booth	87	36	16,400	Ambient

Recommendation

The staff recommends to the Commissioner that the Significant Source Modification and Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on December 5, 2002. Additional information was received on February 28, 2003 and April 11, 2003.

Emission Calculations

See Appendix A: pages 1 through 10 of this document for detailed emissions calculations.

Potential To Emit Before Controls (Modification)

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	less than 100
PM-10	less than 100
SO_2	less than 100
VOC	greater than 250
CO	less than 100
NO_x	less than 100

HAP's	Potential To Emit (tons/year)
Methanol	greater than 10
Ethyl Benzene	greater than 10
MEK	greater than 10
MIBK	greater than 10
Toluene	greater than 10
Xylene	greater than 10
Hexamethylene Diisocyanate	less than 10
TOTAL	greater than 25

Justification for Modification

The Title V permit is being modified through a Significant Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(f)(4)(D) because potential VOC emissions are greater than 25 tons per year. The Significant Source Modification will be incorporated into the permit through a Significant Permit Modification because new conditions for record keeping are required to be added to the existing title V permit for the volume weighted average VOC content of the coatings.

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM-10	Atttainment
SO_2	Attainment
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	less than 100
PM-10	less than 100
SO_2	less than 100
VOC	greater than 100, less than 250
CO	less than 100
NOx	less than 100

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

(b) These emissions are based upon T003-7588-00205 on September 3, 1999.

Potential to Emit After Controls for the Modification

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units for the modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Four (4) Paint Booths	1.69 (1)	1.69 (1)	-	< 250 (2)	-	-	< 250 (2)
Total Emissions	1.69	1.69	-	< 250	-	-	< 250

(1) After control emissions.
(2) Maximum allowable VOC emissions in order to comply with 326 IAC 2-2 (PSD).

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to the modification to this source.

(b) This modification is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.390, Subpart MM (Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations). This rule applies to affected facilities in an automobile

or light-duty truck assembly plant. Exempt from this rule are operations used to coat plastic body components or all-plastic automobile or light duty truck bodies on separate coating lines. The source coats plastic automobile trim, not vehicle bodies, and does not assemble automobiles or light-duty trucks, therefore, the requirements of 40 CFR Part 60.390, Subpart MM do not apply.

(c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to the modification to this source.

(d) This modification to this source is not subject to the provisions of 40 CFR 64, Compliance Assurance Monitoring. In order for this rule to apply, a specific emissions unit must meet three criteria for a given pollutant:

(1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant;

(2) The unit uses a control device to achieve compliance with any such emission limitation or standard, and

(3) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal or greater than 100 percent of the amount required for a source to be classified as a major source.

For this modification, no unit meets all three criteria for a given pollutant. Therefore, 40 CFR 64 is not applicable.

(e) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are applicable to this source because the source is a major source of HAPs (i.e., the source has the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs) and the source includes one or more units that belong to one or more source categories affected by the Section 112(j) Maximum Achievable Control Technology (MACT) Hammer date of May 15, 2002.

(1) This rule requires the source to:

(A) Submit a Part 1 MACT Application by May 15, 2002; and

(B) Submit a Part 2 MACT Application for each affected source category in accordance with the appropriate Part 2 MACT Application deadline listed in Table 1 to 40 CFR 63, Subpart B for the affected source category.

(2) The Permittee submitted a Part 1 MACT Application on May 15, 2002.

(3) Pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The MACT and the General Provisions of 40 CFR 63, Subpart A will become new applicable requirements, as defined by 326 IAC 2-7-1(6), that must be incorporated into the Part 70 permit. After IDEM, OAQ receives the initial notification, any of

the following will occur:

(A) If three or more years remain on the Part 70 permit term at the time the MACT is promulgated, IDEM, OAQ will notify the source that IDEM, OAQ will reopen the permit to include the MACT requirements pursuant to 326 IAC 2-7-9; or

(B) If less than three years remain on the Part 70 permit term at the time the MACT is promulgated, the Permittee must include information regarding the MACT in the renewal application, including the information required in 326 IAC 2-7-4(c); or

(C) The Permittee may submit an application for a significant permit modification under 326 IAC 2-7-12 to incorporate the MACT requirements. The application may include information regarding which portions of the MACT are applicable to the emission units at the source and which compliance options will be followed.

The source is a major source of HAPs and coat both metal and plastic parts, therefore, it is subject to 40 CFR Part 63, Subpart MMMM (Miscellaneous Metal Parts and Products) and 40 CFR Part 63, Subpart PPPP (Plastics Parts Surface Coating).

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This modification to a PSD minor source is not subject to this rule. This rule applies to modifications with the potential to emit (PTE) greater than or equal to 250 tons of VOC per year. The source shall continue to limit VOC emissions from the four (4) paint booths to less than 250 tons per 12 consecutive month period, with compliance determined at the end of each month. Therefore, this modification is not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration).

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

This modification is not subject to this rule. This rule applies to major sources of hazardous air pollutants (HAP) that were constructed or reconstructed after July 27, 1997. The fixed capital cost of the replacement does not exceed 50% of the fixed capital cost of a comparable new facility, therefore, there is no reconstruction or new construction to the source as a result of this replacement. Therefore, 326 IAC 2-4.1 does not apply.

State Rule Applicability - Individual Facilities

There are no new state rules applicable to this source during this modification review process. The applicability determination that follows is based on that conducted for the original Part 70 T003-7588-00205, issued on September 3, 1999.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

There is no new construction at the source, since the fixed capital cost of the replacement does not exceed 50% of the fixed capital cost of a comparable new facility. Therefore 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) does not apply to this modification. However, there has been some changes to the coating lines at the source resulting in an increase in VOC content of the coatings. Therefore, the source shall use daily volume weighted average compliance determination to continue demonstrating compliance with the VOC content limits for the coating of plastic parts set forth in the BACT condition of CP 003-8519-00205, issued on October 22, 1997.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

There have been some changes to the coating lines at the source resulting in an increase in VOC content of the coatings. Therefore, the source shall use daily volume weighted average compliance determination to continue demonstrating compliance with the VOC content limits for Miscellaneous Metal Coating.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. Paint booths (PB1 - PB4) have applicable compliance monitoring conditions as specified below:

   (a) Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks (PB-1 through PB-4) while the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

   (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step.

Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

These monitoring conditions are necessary because the water wash must operate properly to ensure compliance with 326 IAC 6-3-2(d) (Particulate Emission Limitations).

Proposed Changes to the Part 70 Operating Permit

The following changes are made as the First Significant Source Modification 003-16500-00205 to Part 70 Operating Permit No. T003-7588-00205 (new language shown in bold and deleted language shown with a line through it):

(1) The following changes have been made to Section A.2.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) Four (4) paint booths, identified as PB1, PB2, PB3, PB4, each equipped with ~~a~~ **two (2)** 8,200 acfm exhaust fan, with a maximum capacity of one of the following:
(1) **280**~~120~~ plastic large end caps per hour;
(2) **280**~~150~~ plastic air deflectors per hour;
(3) **140**~~104~~ plastic door trim parts per hour;
(4) **420**~~100~~ miscellaneous metal parts per hour;

~~(b) One (1) paint booth, identified as PB5, equipped with a 8,200 acfm exhaust fan, with a maximum capacity of one of the following:~~
~~(1) 8 plastic tractor hoods per hour;~~
~~(2) 12 plastic cab shelves per hour;~~
~~(3) 30 metal military parts per hour;~~
~~(4) 10 plastic E/P roofs per hour;~~
~~(5) 12 plastic large end caps per hour;~~

~~(c) Four (4) paint booths, identified as PB8, PB9, PB10, PB11, each equipped with a 7,300 acfm exhaust fan, with a maximum capacity of one of the following:~~
~~(1) 72 plastic E/P roofs per hour; and~~
~~(2) 100 plastic large end caps per hour~~

all paint booths listed are each equipped with either a high volume low pressure (HVLP) spray gun applications or an electrostatic spray equipment and ~~dry filters~~ **water wash filtration** for particulate matter control and each exhausting through one (1) stack, ID #'s PB-1 through PB-~~11~~**4**, respectively.

(2) The old condition C.15 in the Title V permit has been replaced with the current Title V model permit language because the revised Compliance Monitoring Requirements in D.1.9 references the updated C.15 condition, title and wording.

~~C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]~~

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions

~~shall prevail.~~

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

(3) Application Requirements for Section 112(j) of the Clean Air Act was added to the permit.

Part 2 MACT Application Submittal Requirement

C.22 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]

(a) The Permittee shall submit a Part 2 MACT Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).

(b) Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:

(1) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;

(2) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or

(3) The MACT standard or standards for the affected source categories included at the source are promulgated.

(c) Notwithstanding paragraph (a), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include

the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The initial notification shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(4) The following revisions have been made to the facility description box in Section D.1.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
(a) Four (4) paint booths, identified as PB1, PB2, PB3, PB4, each equipped with ~~a~~ **two (2)** 8,200 acfm exhaust fan, with a maximum capacity of one of the following:
(1) **280**~~120~~ plastic large end caps per hour;
(2) **280**~~150~~ plastic air deflectors per hour;
(3) **140**~~104~~ plastic door trim parts per hour;
(4) **420**~~100~~ miscellaneous metal parts per hour~~;~~

~~(b) One (1) paint booth, identified as PB5, equipped with a 8,200 acfm exhaust fan, with a maximum capacity of one of the following:~~
~~(1) 8 plastic tractor hoods per hour;~~
~~(2) 12 plastic cab shelves per hour;~~
~~(3) 30 metal military parts per hour;~~
~~(4) 10 plastic E/P roofs per hour;~~
~~(5) 12 plastic large end caps per hour;~~

~~(c) Four (4) paint booths, identified as PB8, PB9, PB10, PB11, each equipped with a 7,300 acfm exhaust fan, with a maximum capacity of one of the following:~~
~~(1) 72 plastic E/P roofs per hour; and~~
~~(2) 100 plastic large end caps per hour~~

all paint booths listed are each equipped with either a high volume low pressure (HVLP) spray gun applications or an electrostatic spray equipment and ~~dry filters~~ **water wash filtration** for particulate matter control and each exhausting through one (1) stack, ID #'s PB-1 through PB-~~11~~**4**, respectively.

(5) Condition D.1.3 has been updated to incorporate "with compliance determined at the end of each month" instead of "rolled on a monthly basis"; to make it clear that compliance with the limit should be demonstrated at the end of each month. The language in condition D.1.3 has been modified in the permit as follows:

D.1.3 PSD Minor Limit [326 IAC 2-2] ~~[40 CFR 52.21]~~

Pursuant to t~~T~~he requirement from CP-003-8519-00205, issued on October 22, 1997 **and modified in Significant Permit Modification 003-17491-00205**, ~~Operating Condition 7, requiring that~~ **the VOC usage including coatings, dilution solvents, and cleaning solvents at** the ~~nine (9)~~ **four (4)** paint booths shall be limited to ~~248.7 tons per year, based on a 365-day period, rolled on a daily basis, is not applicable because IDEM, OAM has determined that such emissions units shall be limited to~~ less than 250 tons ~~of VOC, including coatings, dilution solvents, and cleaning solvents,~~ per 12 consecutive month period, ~~rolled on a monthly basis~~ **with compliance demonstrated at the end of each month**. This usage limit is required to limit the **source wide** potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 and ~~40 CFR 52.21~~ (Prevention of Significant Deterioration) not applicable.

(6) The following updates have been made to incorporate the 326 IAC 6-3 revisions that became effective on June 12, 2002. Previously, the terms "particulate" and "particulate matter" were both used in the rule, but now the term "particulate" is used consistently in 326 IAC 6-3. Also, the revised rule requires particulate from the surface coating processes to be controlled by a dry particulate filter, waterwash, or an equivalent control device, and operated in accordance with manufacturer's specifications, therefore, D.1.9 was removed and D.1.5 was added under Emission Limitations and Standards. The rest of the conditions have been re-numbered accordingly.

D.1.4 Particulate Matter (PM) ~~[326 IAC 6-3-2(c)]~~ **[40 CFR 52 Subpart P]**

Pursuant to CP-003-8519-00205, issued on October 22, 1997 **and 40 CFR 52 Subpart P**, the PM from the ~~nine (9)~~ **four (4)** paint booths **(PB1 - PB4)**shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.5 Particulate [326 IAC 6-3-2(d)]

Pursuant to CP-003-8519-00205, issued on October 22, 1997 and 326 IAC 6-3-2(d), particulate from the four (4) paint booths (PB1 - PB4) shall each be controlled by a waterwash, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

(7) A new Condition D.1.7(a) (now re-numbered D.1.8(a)) has been added to the permit to include the volume weighted average compliance determination.

D.1.~~7~~**8** Volatile Organic Compounds (VOC) **[326 IAC 8-1-2] [326 IAC 8-1-4]**

(a) Compliance with the VOC content limit in conditions D.1.1(b) and D.1.2 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

A = [? © x U) / ? U]

Where: A is the volume weighted average in pounds VOC per gallon less water as

applied;

C is the VOC content of the coating in pounds VOC per gallon less water as applied;

and U is the usage rate of the coating in gallons per day.

(b) Compliance with the VOC content and usage limitations contained in Condition D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(8) Condition D.1.8 was incorporated into D.1.3, therefore, D.1.8 VOC Emissions is no longer needed.

~~D.1.8 VOC Emissions~~

~~Compliance with Condition D.1.3 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent 12 month period.~~

(9) Condition D.1.9 was incorporated into D.1.5, therefore, D.1.9 Particulate Matter (PM) is no longer needed.

~~D.1.9 Particulate Matter (PM)~~

~~Pursuant to CP-003-8519-00205, issued on October 22, 1997, the dry filters for PM control shall be in operation at all times when the nine (9) paint booths are in operation.~~

(10) The modified booths will use water wash for particulate matter control, therefore, the compliance monitoring language for dry filters has been replaced with the water wash compliance monitoring language.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.~~10~~**9** Monitoring

~~(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (PB-1 through PB-11) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

(a) Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks (PB-1 through PB-4) while the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - ~~Compliance Monitoring Plan - Failure to Take Response Steps~~ **Compliance Response Plan - Preparation, Implementation, Records, and Reports**, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

(11) New VOC record keeping requirements language has been incorporated into D.1.10 (previously D.1.11). The rest of the condition has been re-numbered accordingly.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.1~~1~~**0** Record Keeping Requirements

(a) To document compliance with conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in conditions D.1.1 and D.1.2.

(1) The VOC content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used on daily basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.

(3) The volume weighted average VOC content of the coatings used for each day;

(4) The daily cleanup solvent usage; and

(5) The total VOC usage for each day.

(6) A record of the test gauge air pressure utilized on the HVLP spray equipment for each week.

(~~a~~**b**) To document compliance with Condition~~s D.1.1 through~~ D.1.3, the Permittee shall maintain records in accordance with (1) through (~~7~~**4**) below. Records maintained for (1) through (~~7~~**4**) shall be taken ~~daily~~ **monthly** and shall be complete and sufficient to establish compliance

with the VOC usage limit~~s~~ and/or the VOC emission limit~~s~~ established in Condition~~s D.1.1 through~~ D.1.3.

(1) ~~The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~

The amount of coating material and solvent used on monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.

~~(2) A log of the dates of use;~~

~~(3) The volume weighted VOC content of the coatings used for each month;~~

(~~4~~**2**) The cleanup solvent usage for each month;

(~~5~~**3**) The total VOC usage for each month; **and**

(~~6~~**4**) The weight of VOCs emitted for each compliance period~~; and~~**.**

~~(7) A record of the test gauge air pressure utilized on the HVLP spray equipment for each week.~~

(~~b~~**c**) To document compliance with Condition D.1.~~10~~**9**, the Permittee shall maintain a log of weekly overspray observations, **weekly observations of the water level in the pans,** daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(12) The following reporting form for demonstrating compliance with Condition D.1.3 has been revised as follows:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Elite Enterprises, Inc.
Source Address: 2701 South Coliseum Boulevard, Suite 1158, Fort Wayne, IN 46803
Mailing Address: 2701 South Coliseum Boulevard, Suite 1158, Fort Wayne, IN 46803
Part 70 Permit No.: T003-7588-00205
Facility: **Four (4**) ~~Nine (9)~~ paint booths
Parameter: Volatile Organic Compounds (VOC)
Limit: The ~~nine (9)~~ **four (4)** paint booths shall use ~~no more~~ **less** than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period, ~~rolled on a monthly basis~~ **with compliance demonstrated at the end of each month**.

Month	VOC Usage	VOC Usage	VOC Usage
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			

Month 3			

? No deviation occurred in this month.

? Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Conclusion

This source modification shall be subject to the conditions of the attached Part 70 Significant Source Modification No. 003-16500-00205 and Significant Permit Modification No. 003-17491-00205.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Elite Enterprise, Inc.
Address City IN Zip: 2701 South Coliseum Blvd., Fort Wayne, IN 46803
Source Mod. No.: SSM 003-16500-00205
Permit Mod. No.: SPM 003-17491-00205
Reviewer: Alic Bent/EVP
Date: 15-Apr-03

Material	Program	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum Usage (units/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
PB1																
222S Clear Adhesion	Mirror Covers	7.1	94.22%	0.0%	94.2%	0.0%	4.11%	0.00520	780	6.66	6.66	27.02	118.34	0.41	#DIV/0!	75%
764-2591 DK. Grey	TPO EndCaps & Centers	7.8	79.43%	0.0%	79.4%	0.0%	15.15%	0.02280	240	6.17	6.17	33.77	147.92	2.19	150.16	75%
MPP4110A	Boiler Covers	7.4	89.47%	0.0%	89.5%	0.0%	7.27%	0.01391	180	6.66	6.66	16.67	73.00	0.49	43.94	75%
	Total PB1											**33.77**	**147.92**	**2.19**		

Elite Enterprises, Inc.
Fort Wayne, Indiana

Material	Program	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum Usage (units/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
PB2																
193S IMRON 5000	TPO EndCaps & Centers (Flexible Gray)	9.0	25.01%	0.0%	25.0%	0.0%	70.02%	0.00680	240	2.26	2.26	3.68	16.13	2.76	#DIV/0!	75%
193S IMRON 5000	TPO EndCaps & Centers (Silver Flexible)	9.0	25.01%	0.0%	25.0%	0.0%	70.02%	0.00360	240	2.26	2.26	1.95	8.54	1.46	3.22	75%
193S IMRON 5000	Mirror Covers	9.0	25.01%	0.0%	25.0%	0.0%	70.02%	0.00130	780	2.26	2.26	2.29	10.02	1.71	3.22	75%
193S IMRON 5000	Columbia Bumpers	9.0	25.01%	0.0%	25.0%	0.0%	70.02%	0.00670	100	2.26	2.26	1.51	6.62	1.13	3.22	75%
373P23290 Flexible	TPO EndCaps & Centers	10.5	35.98%	0.0%	36.0%	0.0%	45.11%	0.02650	240	3.77	3.77	24.00	105.14	10.68	5.39	75%
373P23290 Flexible	Mirror Covers	10.5	35.98%	0.0%	36.0%	0.0%	45.11%	0.00604	780	3.77	3.77	17.78	77.88	7.91	8.37	75%
373P24812 ARGENT Silver Flexible primer	TPO EndCaps & Centers	9.2	43.94%	0.0%	43.9%	0.0%	42.33%	0.01480	240	4.05	4.05	14.39	63.03	4.59	8.98	75%
373P24812 ARGENT Silver Flexible primer	Columbia Bumpers	9.2	43.94%	0.0%	43.9%	0.0%	42.33%	0.02660	100	4.05	4.05	10.78	47.20	3.44	9.57	75%
11ALC46859 A.D. Gray Cond. Primer	Fender Extensions	8.7	62.10%	0.0%	62.1%	0.0%	23.60%	0.03100	240	5.40	5.40	40.20	176.06	6.13	12.76	75%
11ALC46859 A.D. Gray Cond. Primer	IC Bus Badge	8.7	62.10%	0.0%	62.1%	0.0%	23.60%	0.00620	500	5.40	5.40	16.75	73.36	2.56	22.89	75%
818-5325 Stonegard Primer	Tecstar	10.9	32.48%	0.0%	32.5%	0.0%	52.40%	0.09850	270	3.53	3.53	93.81	410.88	48.75	14.95	75%
HAP34256B TPO-5 GLOSS Dk. Gray Primer	Side Fairings	8.9	47.06%	0.0%	47.1%	0.0%	42.03%	0.05140	120	4.21	4.21	25.95	113.66	7.30	8.03	75%
HAP34256B TPO-5 GLOSS Dk. Gray Primer	Columbia Bumpers	8.9	47.06%	0.0%	47.1%	0.0%	42.03%	0.05140	100	4.21	4.21	21.62	94.72	6.08	10.01	75%
602-1060F HS CONDUCTIVE PRIMER	Delphi Bezels	8.9	57.45%	0.0%	57.5%	0.0%	32.69%	0.00011	10,152	5.12	5.12	5.72	25.04	1.06	12.18	75%
602-1060F HS CONDUCTIVE PRIMER	Plastic Omnium Bezels	8.9	57.45%	0.0%	57.5%	0.0%	32.69%	0.00011	10,152	5.12	5.12	5.72	25.04	1.06	15.66	75%

Elite Enterprises, Inc.

Fort Wayne, Indiana

Material	Program	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum Usage (units/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
PB2 Cont'd																
602-1060F HS CONDUCTIVE PRIMER	Tow Hook Covers	8.9	57.45%	0.0%	57.5%	0.0%	32.69%	0.02500	96	5.12	5.12	12.29	53.81	2.27	15.66	75%
RPPW9800 Primer	KJ & CS Fuel Doors	10.3	37.69%	0.0%	37.7%	0.0%	54.07%	0.00270	2,400	3.88	3.88	25.13	110.08	10.39	11.86	75%
RPPW9800 Primer	P221 Fuel Doors	10.3	37.69%	0.0%	37.7%	0.0%	54.07%	0.00270	1,800	3.88	3.88	18.85	82.56	7.79	7.17	75%
SF53MP-4 Primer T.I.	Lacks	7.9	74.48%	0.0%	74.5%	0.0%	0.00%	0.00020	6,300	5.87	5.87	7.39	32.39	0.63	10.85	75%
UAE2560 POPFREE(TM) GRAY CONDUCTIVE PRIMER	B-Pillars	9.7	48.30%	0.0%	48.3%	0.0%	31.10%	0.01461	300	4.66	20.43	89.54	392.19	5.47	#DIV/0!	75%
UAE2560 POPFREE(TM) GRAY CONDUCTIVE PRIMER	Savana	9.7	48.30%	0.0%	48.3%	0.0%	31.10%	0.04275	90	4.66	17.93	69.00	302.21	4.80	14.99	75%
XM0226 Clear Urethane Hardener (Part B)	B-Pillars	8.8	25.97%	0.0%	26.0%	0.0%	69.99%	0.00258	300	2.28	2.28	1.76	7.73	1.26	7.33	75%
XM0226 Clear Urethane Hardener (Part B)	Savana	8.8	25.97%	0.0%	26.0%	0.0%	69.99%	0.00754	90	2.28	2.28	1.55	6.78	1.10	3.26	75%
Acetone	TPO EndCaps & Centers	6.6	100.00%	0.0%	100.0%	0.0%	0.00%	0.00164	240	6.59	6.59	2.59	11.36	0.00	9.42	0%
Acetone	Columbia Bumpers	6.6	100.00%	0.0%	100.0%	0.0%	0.00%	0.00296	100	6.59	6.59	1.95	8.54	0.00	#DIV/0!	0%
EB-Acetate	Lacks	7.8	100.00%	0.0%	100.0%	0.0%	0.00%	0.00020	6,300	7.84	7.84	9.88	43.27	0.00	#DIV/0!	0%
NBA Butyl Acetate	Tecstar	7.4	100.00%	0.0%	100.0%	0.0%	0.00%	0.18970	270	7.35	7.35	376.46	1648.89	0.00	#DIV/0!	0%
NBA Butyl Acetate	KJ & CS Fuel Doors	7.4	100.00%	0.0%	100.0%	0.0%	0.00%	0.00014	2,400	7.35	7.35	2.47	10.82	0.00	#DIV/0!	0%
NBA Butyl Acetate	P221 Fuel Doors	7.4	100.00%	0.0%	100.0%	0.0%	0.00%	0.00014	1,800	7.35	7.35	1.85	8.11	0.00	#DIV/0!	0%
Glycol/Ether/EB EB	IC Bus Badge	7.5	100.00%	0.0%	100.0%	0.0%	0.00%	0.00069	500	7.49	7.49	2.58	11.32	0.00	#DIV/0!	0%
Glycol/Ether/EB EB	Fender Extensions	7.5	100.00%	0.0%	100.0%	0.0%	0.00%	0.00034	240	7.49	7.49	0.62	2.71	0.00	#DIV/0!	0%
Xylene	Lacks	7.3	100.00%	0.0%	100.0%	0.0%	0.00%	0.00060	6,300	7.25	7.25	27.41	120.03	0.00	#DIV/0!	0%
	Total PB2											**519.62**	**2275.94**	**48.75**		

Elite Enterprises, Inc.
Fort Wayne, Indiana

Material	Program	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum Usage (units/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
PB3																
CBC382EA Pewter Metallic	Tecstar	8.3	45.77%	0.0%	45.8%	0.0%	46.29%	0.03940	270	3.80	3.80	40.46	177.22	11.99	#DIV/0!	75%
CBC8555G Black	Tecstar	8.2	41.28%	0.0%	41.3%	0.0%	50.66%	0.04650	270	3.38	3.38	42.45	185.91	15.09	7.30	75%
CBC8624A Olympic White	Tecstar	10.1	39.93%	0.0%	39.9%	0.0%	42.46%	0.04570	270	4.03	4.03	49.71	217.74	18.70	7.95	75%
CBC8624A Olympic White	Delphi Bezels	10.1	39.93%	0.0%	39.9%	0.0%	42.46%	0.00025	10,152	4.03	4.03	10.23	44.79	3.85	9.49	75%
CBC8624A Olympic White	P221 Fuel Doors	10.1	39.93%	0.0%	39.9%	0.0%	42.46%	0.00457	1,800	4.03	4.03	33.14	145.16	12.46	9.49	75%
CBC8624A Olympic White	Savana	10.1	39.93%	0.0%	39.9%	0.0%	42.46%	0.04570	90	4.03	4.03	16.57	72.58	6.23	9.49	75%
CBC8624A Olympic White	Tow Hook Covers	10.1	39.93%	0.0%	39.9%	0.0%	42.46%	0.02229	96	4.03	4.03	8.62	37.76	3.24	9.49	75%
UHD72MP-B24B New Mustang	Lacks	8.3	57.82%	0.0%	57.8%	0.0%	0.00%	0.00110	6,300	4.80	4.80	33.26	145.67	6.07	11.30	75%
872AB921 Black Basecoat	Tecstar	8.1	51.26%	0.0%	51.3%	0.0%	41.87%	0.04650	270	4.14	4.14	52.00	227.76	12.36	#DIV/0!	75%
871X 6112 Pewter Metallic	Tecstar	8.1	50.79%	0.0%	50.8%	0.0%	41.25%	0.04060	270	4.12	4.12	45.21	198.02	10.95	9.85	75%
872X 5963 Olympic White	Tecstar	10.7	36.36%	0.0%	36.4%	0.0%	46.89%	0.04560	270	3.89	3.89	47.86	209.61	20.94	9.42	75%
872X 5963 Olympic White	Plastic Omnium Bezels	10.7	36.36%	0.0%	36.4%	0.0%	46.89%	0.00027	10,152	3.89	3.89	10.65	46.66	4.66	8.29	75%
C-17 1,6 Hexamathylene Diisocyanate	Lacks	9.4	10.40%	0.0%	10.4%	0.0%	87.00%	0.00018	6,300	0.98	0.98	1.11	4.86	2.39	2.08	75%
TKPS8624A OLYMPIC WHITE	Headlamp Washer Covers	9.7	36.69%	0.0%	36.7%	0.0%	48.95%	0.00052	520	3.56	3.56	0.96	4.22	0.42	4.09	75%
TKPSM382E PEWTER METALLIC	Boiler Covers	8.4	60.86%	0.0%	60.9%	0.0%	28.50%	0.07878	180	5.11	5.11	72.49	317.52	11.66	10.44	75%
MAK Methyl N-Amyl Ketone	Lacks	6.8	100.00%	0.0%	100.0%	0.0%	0.00%	0.00045	6,300	6.80	6.80	19.28	84.44	0.00	23.86	0%
PM-Acetate	Lacks	8.1	100.00%	0.0%	100.0%	0.0%	0.00%	0.00045	6,300	8.06	8.06	22.85	100.08	0.00	#DIV/0!	0%
Xylene	Plastic Omnium Bezels	7.3	100.00%	0.0%	100.0%	0.0%	0.00%	0.00007	10,152	7.25	7.25	5.15	22.57	0.00	#DIV/0!	0%
Glycol/Ether/EB EB Solvent	Lacks	7.5	100.00%	0.0%	100.0%	0.0%	0.00%	0.00002	6,300	7.49	7.49	0.94	4.13	0.00	#DIV/0!	0%
Glycol/Ether/EB EB Solvent	Plastic Omnium Bezels	7.5	100.00%	0.0%	100.0%	0.0%	0.00%	0.00001	10,152	7.49	7.49	0.76	3.33	0.00	#DIV/0!	0%
Glycol/Ether/EB EB Solvent	Tecstar	7.5	100.00%	0.0%	100.0%	0.0%	0.00%	0.00084	270	7.49	7.49	1.70	7.44	0.00	#DIV/0!	0%
Acetone	Tecstar	6.6	100.00%	0.0%	100.0%	0.0%	0.00%	0.00835	270	6.59	6.59	14.86	65.07	0.00	#DIV/0!	0%
	Total PB3											**138.03**	**604.59**	**20.94**		

Elite Enterprises, Inc.
Fort Wayne, Indiana

Material	Program	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum Usage (units/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
PB4																
RK-7017 Clara 2K	Tecstar	8.3	46.41%	0.0%	46.4%	0.0%	47.18%	0.02550	270	3.86	3.86	26.59	116.44	7.67	#DIV/0!	75%
RK-7017 Clara 2K	Plastic Omnium Bezels	8.3	46.41%	0.0%	46.4%	0.0%	47.18%	0.00026	10,152	3.86	3.86	10.19	44.64	2.94	8.18	75%
RK-7017 Clara 2K	Savana	8.3	46.41%	0.0%	46.4%	0.0%	47.18%	0.02550	90	3.86	3.86	8.86	38.81	2.56	8.18	75%
Rk-7018 Urethane Activator	Tecstar	8.9	28.00%	0.0%	28.0%	0.0%	65.74%	0.01050	270	2.50	2.50	7.08	31.01	4.55	5.29	75%
Rk-7018 Urethane Activator	Plastic Omnium Bezels	8.9	28.00%	0.0%	28.0%	0.0%	65.74%	0.00011	10,152	2.50	2.50	2.79	12.22	1.79	3.80	75%
Rk-7018 Urethane Activator	Savana	8.9	28.00%	0.0%	28.0%	0.0%	65.74%	0.01050	90	2.50	2.50	2.36	10.34	1.52	3.80	75%
C-17 1,6 Hexamathylene Diioscyanate	Lacks	9.4	10.40%	0.0%	10.4%	0.0%	87.00%	0.00067	6,300	0.98	0.98	4.13	18.07	8.89	1.49	75%
HD7CP-B1 Clear Coat	Lacks	8.3	50.57%	0.0%	50.6%	0.0%	0.00%	0.00200	6,300	4.17	4.17	52.57	230.25	12.85	4.80	75%
TKU2000C 2-K CLEARCOAT	Boiler Covers	7.9	57.88%	0.0%	57.9%	0.0%	36.16%	0.03795	180	4.58	4.58	31.31	137.16	5.70	#DIV/0!	75%
TKU2000C 2-K CLEARCOAT	Headlamp Washer Covers	7.9	57.88%	0.0%	57.9%	0.0%	36.16%	0.00107	520	4.58	4.58	2.55	11.17	0.46	12.68	75%
DCT1002B	Delphi Bezels	8.4	40.04%	0.0%	40.0%	0.0%	55.60%	0.00029	10,152	3.36	3.36	9.90	43.37	3.71	9.30	75%
DCT1002B	Tow Hook Covers	8.4	40.04%	0.0%	40.0%	0.0%	55.60%	0.02258	96	3.36	3.36	7.29	31.93	2.73	6.05	75%
DCT1002B	P221 Fuel Doors	8.4	40.04%	0.0%	40.0%	0.0%	55.60%	0.00529	1,800	3.36	3.36	32.03	140.27	11.99	6.05	75%
Xylene	Tecstar	7.3	100.00%	0.0%	100.0%	0.0%	0.00%	0.01570	270	7.25	7.25	30.73	134.61	0.00	13.04	0%
Xylene	Plastic Omnium Bezels	7.3	100.00%	0.0%	100.0%	0.0%	0.00%	0.00016	10,152	7.25	7.25	11.78	51.58	0.00	#DIV/0!	0%
Xylene	Savana	7.3	100.00%	0.0%	100.0%	0.0%	0.00%	0.01570	90	7.25	7.25	10.24	44.87	0.00	#DIV/0!	0%
MAK Methyl N-Amyl Ketone	Lacks	6.8	100.00%	0.0%	100.0%	0.0%	0.00%	0.00029	6,300	6.80	6.80	12.42	54.42	0.00	#DIV/0!	0%
PM-Acetate	Lacks	8.1	100.00%	0.0%	100.0%	0.0%	0.00%	0.00029	6,300	8.06	8.06	14.73	64.50	0.00	#DIV/0!	0%
	Total PB4											**132.47**	**580.22**	**12.85**		
										Potential Emissions		**790.12**	**3460.75**	**82.54**		
										Controlled PM Emissions				**1.65**		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Maximum Gal of Material
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Maximum Gal of Material * (8760 hr/yr)*(1ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Elite Enterprise, Inc.
Address City IN Zip: 2701 South Coliseum Blvd., Fort Wayne, IN 46803
Source Mod. No.: SSM 003-16500-00205
Permit Mod. No.: SPM 003-17491-00205
Permit Reviewer: Alic Bent/EVP
Date: 15-Apr-03

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Hexa methylene diisocyanate	Weight % EthylBenzene	Weight % MEK	Weight % MIBK	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Hexamethylene diisocyanate Emissions (ton/yr)	EthylBenzene Emissions (ton/yr)	MEK Emissions (ton/yr)	MIBK Emissions (ton/yr)	Methanol Emissions (ton/yr)
PB1																	
222S Clear Adhesion	7.1	0.00520	780	15.00%	35.00%	0.00%	3.00%	0.00%	0.00%	0.00%	18.84	43.96	0.00	3.77	0.00	0.00	0.00
764-2591 DK. Grey	7.8	0.02280	240	38.00%	7.00%	0.00%	4.70%	6.00%	0.00%	0.00%	70.77	13.04	0.00	8.75	11.17	0.00	0.00
MPP4110A	7.4	0.01391	180	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
											70.77	**43.96**	**0.00**	**8.75**	**11.17**	**0.00**	**0.00**

Elite Enterprises, Inc.
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Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Hexa methylene diisocyanate	Weight % EthylBenzene	Weight % MEK	Weight % MIBK	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Hexamethylene diisocyanate Emissions (ton/yr)	EthylBenzene Emissions (ton/yr)	MEK Emissions (ton/yr)	MIBK Emissions (ton/yr)	Methanol Emissions (ton/yr)
PB2																	
193S IMRON 5000	9.0	0.00680	240	0.00%	0.00%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
193S IMRON 5000	9.0	0.00360	240	0.00%	0.00%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
193S IMRON 5000	9.0	0.00130	780	0.00%	0.00%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
193S IMRON 5000	9.0	0.00670	100	0.00%	0.00%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
373P23290 Flexible	10.5	0.02650	240	0.00%	0.00%	0.00%	0.00%	2.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
373P23290 Flexible	10.5	0.00604	780	0.00%	0.00%	0.00%	0.00%	2.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
373P24812 ARGENT Silver Flexible primer	9.2	0.01480	240	0.00%	0.00%	0.00%	0.00%	3.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
373P24812 ARGENT Silver Flexible primer	9.2	0.02660	100	0.00%	0.00%	0.00%	0.00%	3.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
11ALC46859 A.D. Gray Cond. Primer	8.7	0.03100	240	20.00%	20.00%	0.00%	5.00%	5.00%	0.00%	0.00%	56.70	1.30	0.00	0.00	0.00	0.00	0.00
11ALC46859 A.D. Gray Cond. Primer	8.7	0.00620	500	20.00%	20.00%	0.00%	5.00%	5.00%	0.00%	0.00%	23.63	0.54	0.00	0.00	0.00	0.00	0.00
818-5325 Stonegard Primer	10.9	0.09850	270	0.00%	0.00%	0.00%	0.00%	0.00%	2.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HAP34256B TPO-5 GLOSS Dk. Gray Primer	8.9	0.05140	120	3.94%	0.00%	0.00%	0.33%	0.00%	0.00%	0.00%	9.52	0.00	0.00	0.00	0.00	0.00	0.00
HAP34256B TPO-5 GLOSS Dk. Gray Primer	8.9	0.05140	100	3.94%	0.00%	0.00%	0.33%	0.00%	0.17%	2.69%	7.93	0.00	0.00	0.00	0.00	0.00	0.00

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Hexa methylene diisocyanate	Weight % EthylBenzene	Weight % MEK	Weight % MIBK	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Hexamethylene diisocyanate Emissions (ton/yr)	EthylBenzene Emissions (ton/yr)	MEK Emissions (ton/yr)	MIBK Emissions (ton/yr)	Methanol Emissions (ton/yr)
PB2 Cont'd																	
602-1060F HS CONDUCTIVE PRIMER	8.9	0.00011	10,152	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
602-1060F HS CONDUCTIVE PRIMER	8.9	0.00011	10,152	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
602-1060F HS CONDUCTIVE PRIMER	8.9	0.02500	96	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RPPW9800 Primer	10.3	0.00270	2,400	0.32%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.93	0.00	0.00	0.00	0.00	0.00	0.00
RPPW9800 Primer	10.3	0.00270	1,800	0.32%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.70	0.00	0.00	0.00	0.00	0.00	0.00
SF53MP-4 Primer T.I.	7.9	0.00020	6,300	13.00%	0.00%	0.00%	0.00%	35.00%	0.00%	0.00%	5.65	0.00	0.00	0.00	15.22	0.00	0.00
UAE2560 POPFREE(TM) GRAY CONDUCTIVE PRIMER	9.7	0.01461	300	0.28%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.52	0.00	0.00	0.00	0.00	0.00	0.00
UAE2560 POPFREE(TM) GRAY CONDUCTIVE PRIMER	9.7	0.04275	90	0.28%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.46	0.00	0.00	0.00	0.00	0.00	0.00
XM0226 Clear Urethane Hardener (Part B)	8.8	0.00258	300	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
XM0226 Clear Urethane Hardener (Part B)	8.8	0.00754	90	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Acetone	6.6	0.00164	240	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Acetone	6.6	0.00296	100	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
EB-Acetate	7.8	0.00020	6,300	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NBA Butyl Acetate	7.4	0.18970	270	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NBA Butyl Acetate	7.4	0.00014	2,400	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NBA Butyl Acetate	7.4	0.00014	1,800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Glycol/Ether/EB EB	7.5	0.00069	500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Glycol/Ether/EB EB	7.5	0.00034	240	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Xylene	7.3	0.00060	6,300	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	120.03	0.00	0.00	0.00	0.00	0.00	0.00
											176.74	**1.30**	**0.00**	**0.00**	**15.22**	**0.00**	**0.00**

Elite Enterprises, Inc.
Fort Wayne, Indiana

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Hexa methylene diisocyanate	Weight % EthylBenzene	Weight % MEK	Weight % MIBK	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Hexamethylene diisocyanate Emissions (ton/yr)	EthylBenzene Emissions (ton/yr)	MEK Emissions (ton/yr)	MIBK Emissions (ton/yr)	Methanol Emissions (ton/yr)
PB3																	
CBC382EA Pewter Metallic	8.3	0.03940	270	2.13%	0.19%	0.00%	0.39%	1.62%	4.02%	0.00%	8.25	0.74	0.00	1.51	6.27	15.57	0.00
CBC8555G Black	8.2	0.04650	270	0.26%	2.17%	0.00%	0.00%	0.00%	0.61%	0.00%	1.17	9.77	0.00	0.00	0.00	2.75	0.00
CBC8624A Olympic White	10.1	0.04570	270	0.56%	3.74%	0.00%	0.12%	0.93%	0.75%	1.95%	3.05	20.39	0.00	0.65	5.07	4.09	10.63
CBC8624A Olympic White	10.1	0.00025	10,152	0.56%	3.74%	0.00%	0.12%	0.93%	0.75%	1.95%	0.63	4.19	0.00	0.13	1.04	0.84	2.19
CBC8624A Olympic White	10.1	0.00457	1,800	0.56%	3.74%	0.00%	0.12%	0.93%	0.75%	1.95%	2.04	13.60	0.00	0.44	3.38	2.73	7.09
CBC8624A Olympic White	10.1	0.04570	90	0.56%	3.74%	0.00%	0.12%	0.93%	0.75%	1.95%	1.02	6.80	0.00	0.22	1.69	1.36	3.54
CBC8624A Olympic White	10.1	0.02229	96	0.56%	3.74%	0.00%	0.12%	0.93%	0.75%	1.95%	0.53	3.54	0.00	0.11	0.88	0.71	1.84
UHD72MP-B24B New	8.3	0.00110	6,300	0.00%	0.00%	0.00%	0.00%	20.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	50.39	0.00	0.00
872AB921 Black Basecoat	8.1	0.04650	270	0.00%	17.00%	0.00%	2.50%	3.00%	0.00%	2.00%	0.00	75.54	0.00	11.11	13.33	0.00	8.89
871X 6112 Pewter Metallic	8.1	0.04060	270	13.00%	0.00%	0.00%	2.50%	2.00%	0.00%	0.00%	50.68	0.00	0.00	9.75	7.80	0.00	0.00
872X 5963 Olympic White	10.7	0.04560	270	10.00%	0.00%	0.00%	1.90%	2.00%	0.00%	3.00%	57.65	0.00	0.00	10.95	11.53	0.00	17.29
872X 5963 Olympic White	10.7	0.00027	10,152	10.00%	0.00%	0.00%	1.90%	2.00%	0.00%	3.00%	12.83	0.00	0.00	2.44	2.57	0.00	3.85
C-17 1,6 Hexamathylene Diisocyanate	9.4	0.00018	6,300	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
TKPS8624A OLYMPIC WHITE	9.7	0.00052	520	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
TKPSM382E PEWTER METALLIC	8.4	0.07878	180	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
MAK Methyl N-Amyl Ketone	6.8	0.00045	6,300	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PM-Acetate	8.1	0.00045	6,300	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Xylene	7.3	0.00007	10,152	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	22.57	0.00	0.00	0.00	0.00	0.00	0.00
Glycol/Ether/EB EB Solvent	7.5	0.00002	6,300	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Glycol/Ether/EB EB Solvent	7.5	0.00001	10,152	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Glycol/Ether/EB EB Solvent	7.5	0.00084	270	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Acetone	6.6	0.00835	270	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
											80.21	**75.54**	**0.00**	**11.11**	**50.39**	**15.57**	**17.29**

Elite Enterprises, Inc.
Fort Wayne, Indiana

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Hexa methylene diisocyanate	Weight % EthylBenzene	Weight % MEK	Weight % MIBK	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Hexamethylene diisocyanate Emissions (ton/yr)	EthylBenzene Emissions (ton/yr)	MEK Emissions (ton/yr)	MIBK Emissions (ton/yr)	Methanol Emissions (ton/yr)
PB4																	
RK-7017 Clara 2K	8.3	0.02550	270	4.00%	0.00%	0.00%	0.70%	0.00%	0.00%	0.00%	10.04	0.00	0.00	1.76	0.00	0.00	0.00
RK-7017 Clara 2K	8.3	0.00026	10,152	4.00%	0.00%	0.00%	0.70%	0.00%	0.00%	0.00%	3.85	0.00	0.00	0.67	0.00	0.00	0.00
RK-7017 Clara 2K	8.3	0.02550	90	4.00%	0.00%	0.00%	0.70%	0.00%	0.00%	0.00%	3.35	0.00	0.00	0.59	0.00	0.00	0.00
Rk-7018 Urethane Activator	8.9	0.01050	270	9.00%	0.00%	0.00%	1.80%	0.00%	0.00%	0.00%	9.97	0.00	0.00	1.99	0.00	0.00	0.00
Rk-7018 Urethane Activator	8.9	0.00011	10,152	9.00%	0.00%	0.00%	1.80%	0.00%	0.00%	0.00%	3.93	0.00	0.00	0.79	0.00	0.00	0.00
Rk-7018 Urethane Activator	8.9	0.01050	90	9.00%	0.00%	0.00%	1.80%	0.00%	0.00%	0.00%	3.32	0.00	0.00	0.66	0.00	0.00	0.00
C-17 1,6 Hexamathylene Diioscyanate	9.4	0.00067	6,300	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HD7CP-B1 Clear Coat	8.3	0.00200	6,300	0.00%	0.00%	0.00%	0.00%	0.00%	15.00%	0.00%	0.00	0.00	0.00	0.00	0.00	68.30	0.00
TKU2000C 2-K CLEARCOAT	7.9	0.03795	180	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
TKU2000C 2-K CLEARCOAT	7.9	0.00107	520	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
DCT1002B	8.4	0.00029	10,152	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
DCT1002B	8.4	0.02258	96	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
DCT1002B	8.4	0.00529	1,800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Xylene	7.3	0.01570	270	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	134.61	0.00	0.00	0.00	0.00	0.00	0.00
Xylene	7.3	0.00016	10,152	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	51.58	0.00	0.00	0.00	0.00	0.00	0.00
Xylene	7.3	0.01570	90	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	44.87	0.00	0.00	0.00	0.00	0.00	0.00
MAK Methyl N-Amyl Ketone	6.8	0.00029	6,300	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PM-Acetate	8.1	0.00029	6,300	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
											241.10	**0.00**	**0.00**	**1.99**	**0.00**	**68.30**	**0.00**
									Total HAP Emissions		**568.81**	**120.80**	**0.00**	**21.85**	**76.78**	**83.86**	**17.29**